



CITY OF SAINT PAUL

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DEPARTMENT OF HUMAN RIGHTS AND
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AFFIRMATIVE ACTION/EQUAL EMPLOYMENT OPPORTUNITY REQUIREMENTS NON-CONSTRUCTION CONTRACTS

Section 183.04 of the Saint Paul Legislative Code (Human Rights Ordinance) and the Rules Governing Affirmative Requirements in Employment set forth the Affirmative Action Requirements which are to be incorporated into and made a part of every contract entered into by the City of Saint Paul. These documents are available on the Saint Paul Department of Human Rights and Equal Economic Opportunity website, at the Department's office at 280 City Hall in Saint Paul, or by calling the Department at (651) 266-8900.

The Saint Paul Department of Human Rights and Equal Economic Opportunity is responsible for monitoring the Contract Compliance Program to determine whether or not persons or firms doing business with the City are complying with Section 183.04 of the Saint Paul Legislative Code and the Rules Governing Affirmative Action in Employment.

As stated in Section 183.04, the contractor will not discriminate against any employee or applicant for employment because of race, creed, religion, sex, sexual or affectional orientation, color, national origin, ancestry, familial status, age, disability, marital status, or status with regard to public assistance.

Employers who contract with the City of Saint Paul must do more than merely avoid discriminatory practices. They must adopt and implement affirmative action programs to employ women, minorities, and people with disabilities.

The contractor must also include the Affirmative Action provisions of the Saint Paul Ordinance and the Rules in every subcontract, purchase order, or agreement with any subcontractor (including material suppliers and subcontractors who enter into a contract with another subcontractor or material supplier), with stipulations that the subcontractor is bound by the terms thereof.

A contractor's good faith affirmative action efforts in the employment of women, minorities, and people with disabilities will be taken into consideration in the awarding of a contract. It is the contractor's responsibility to become familiar and comply with the City's requirements and to ensure that their subcontractors comply with them.

THE FOLLOWING DOCUMENTATION MUST BE SUBMITTED TO THE SAINT PAUL DEPARTMENT OF HUMAN RIGHTS AND EQUAL ECONOMIC OPPORTUNITY FOR APPROVAL BEFORE A CONTRACT WILL BE AWARDED:

AFFIRMATIVE ACTION PROGRAM REGISTRATION

Every contractor or subcontractor, whose total accumulated contract/subcontract awards over the preceding twelve months has met or exceeded \$50,000, must complete and submit to the Department an Affirmative Action Program Registration for analysis. The contractor must certify that it has developed and has implemented an effective Affirmative Action Program, substantially similar to the Department's Model Affirmative Action Program, which shall include hiring goals for the employment of women, minorities, and people with disabilities in the contractor's workforce.

Once the Affirmative Action Program Registration form is completed and accepted by the Saint Paul Department of Human Rights and Equal Economic Opportunity, the contractor will be notified by letter. This Registration is valid for two (2) years, during which time the contractor will be required to submit Semi Annual Compliance Reports to the Department every six months. At the end of the two-year period, the contractor may complete and submit a new Registration form.

A Model Affirmative Action Program is available from the Saint Paul Department of Human Rights and Equal Economic Opportunity by calling (651) 266-8900. A Model Modified Affirmative Action Program is available for contractors with twenty (20) or fewer employees.

Contractors, subcontractors, and major material suppliers are also required to submit to the Saint Paul Department of Human Rights and Equal Economic Opportunity all of their job openings in the eleven (11) county Minneapolis/Saint Paul Metropolitan Statistical Area (Anoka, Carver, Chisago, Dakota, Hennepin, Isanti, Ramsey, Scott, Sherburne, Washington, Wright in Minnesota and Pierce and St. Croix counties in Wisconsin) when they are posted or advertised. Contractors must also submit these openings to Job Connect, a website maintained by Workforce Solutions, a department of Ramsey County). Contractors must commit to use the City's Job Connect system located at www.jobconnect.com as their first source of hiring, which will also qualify as a Good Faith Effort toward achieving affirmative action requirements.

Equal Employment Opportunity Posters must be publicly posted in the offices of the contractor. These posters, also available in Spanish, can be obtained from the Saint Paul Department of Human Rights and Equal Economic Opportunity.

CONTRACTOR COMPLIANCE REVIEWS:

The Department of Human Rights and Equal Economic Opportunity staff will monitor the contractor's and subcontractors' affirmative action efforts and results. On-Site Compliance Reviews will be conducted on the work force of contractors, their subcontractors and material suppliers that enter into contractual agreements with the City of Saint Paul. The purpose of the review is to determine the contractors' compliance with the rules, regulations, and orders of Section 183.04 of the Saint Paul Ordinance. On-site reviews include, but are not limited to, reviewing the implementation of the contractor's Affirmative Action Program, personnel policies and procedures.

Contractors and subcontractors may be required to provide additional documentation in order to determine whether or not they are making measurable improvements in the hiring of minority, female and disabled persons, including, but not limited to:

1. Good Faith Efforts Questionnaire
2. Applicant Flow Data
3. Employee Turnover Data
4. Documentation Supporting Dissemination and Implementation of EEO/AA Policies.
5. Documentation Supporting Recruitment Efforts.

Failure to comply with any of the requirements set forth above is sufficient grounds for disciplinary or remedial actions, provided for under Article IV of the Rules; namely:

1. Termination of the contract;
2. Suspension of the contract until corrective steps are taken;
3. Continuation of the contract subject to the imposition of conditions to correct the noncompliance;
4. Declaration that the contractor shall be ineligible to bid on future contracts either permanently or for a stated time; or
5. A combination of the above.

It is imperative that contractors who are being considered for contracts of \$50,000 or more contact the Department of Human Rights and Equal Economic Opportunity to obtain copies of the requirements and documents in order to expedite the Affirmative Action reviewing process. If you have any questions, please contact a Compliance Officer at (651) 266-8900.